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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA  
RENO DIVISION**

**DOUGLAS RICHEY**, on behalf of )  
himself and all others similarly situated, )

**Plaintiff,**

V.

**AXON ENTERPRISES, INC.,**  
formerly d/b/a **TASER**  
**INTERNATIONAL, INC.**

**Defendant.**

**Case No.: 3:19-cv-00192-MMD-CBC**

**STIPULATION AND ORDER RE:  
BRIEFING DEADLINES FOR  
DEFENDANT'S MOTION TO STRIKE**

Plaintiff, Douglas Richey (“Plaintiff”), and Defendant Axon Enterprise, Inc., formerly d/b/a TASER International, Inc. (“Axon”) (referred to collectively herein as the “Parties”), by and

1 through their respective counsel of record, respectfully submit this Stipulation to allow Plaintiff  
2 thirty (30) additional days to respond to Defendant's Motion to Strike Class Allegations Pursuant  
3 to Rule 23(d)(1)(D), and Defendant an additional twenty-one (21) days to file a reply . This  
4 Stipulation is made in accordance with LR IA 6-2 and LR 7-1. The parties hereby stipulate as  
5 follows:

- 6 1. On April 14, 2020, Defendant filed a motion to strike Plaintiff's class allegations.  
7 See (ECF No. 61). Plaintiff's response was set by this Court to be due on April 28,  
8 2020.
- 9 2. Counsel for Plaintiff conferred with Counsel for Defendant and requested an  
10 additional thirty (30) days to respond to Defendant's motion to strike. Defendant's  
11 motion to strike raises several issues which the parties believe necessitate additional  
12 time to adequately research and fully brief. In addition, the extraordinary  
13 circumstances of the COVID-19 outbreak have changed the working conditions for  
14 all counsel. The offices for Plaintiff's and Defendant's private counsel are currently  
15 minimally staffed with attorneys working primarily from home to minimize the  
16 spread of this disease. In-house counsel for Axon and the legal staff are all working  
17 from home, and will be until at least May 31, 2020. Defense Counsel stated in  
18 writing, via an email sent on April 21, 2020, that it agreed to Plaintiff's request for  
19 a thirty (30) day extension.
- 20 3. After meeting and conferring regarding the aforementioned, the parties have  
21 agreed, and therefore stipulate, to the following: Plaintiff may respond to  
22 Defendant's Motion to Strike on or before May 28, 2020. In turn, Defendant may  
23 submit a Reply in Support of the Motion to Strike on or before June 29, 2020.

Dated this day of April 22, 2020

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By: /s/ Charles A. Jones

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By: /s/ J. Matthew Stephens

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Dated this day of April 22, 2020

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**IT IS SO ORDERED:**



UNITED STATES DISTRICT JUDGE

DATED: April 23, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the law office of Jones Law Firm and that on this 23<sup>rd</sup> day of April, 2020, I e-filed a true and correct copy of the foregoing *Stipulation and [Proposed] Order Re: Plaintiff's Response to Defendant's Motion to Strike* with the Clerk of the Court through the Court's CM/ECF electronic filing system and notice will be sent electronically to the following:

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/s/ Belinda Watson  
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